

Exhibit 52

*revised
1/25/94*

C T F A
THE COSMETIC, TOILETRY, AND FRAGRANCE ASSOCIATION

July 8, 1992
PRST 92-10

E. EDWARD KAVANAUGH
P R E S I D E N T

**CTFA Response Statement
(To be used to respond to inquiries.)**

Safety of Talc - NTP Report

The National Toxicology Program (NTP) recently issued a draft report that noted female rats exposed to massive amounts of airborne talc developed lung tumors. Male rats and male and female mice similarly exposed did not show lung tumors. During the peer review of the study, a number of problems with the conduct of the study were raised. The NTP is now reviewing the results of the peer review and will issue a final report after its review and after modification of the report.

There have been a number of screening tests for carcinogenicity previously conducted using talc. None of these showed any effect. The most thorough study was one sponsored by the U.S. Food and Drug Administration. In addition, all previous long term studies in animals, with a wide variety of exposures, have been negative. Finally, human studies on talc and cancer in industrial settings have shown that industrial exposure to talc, both by skin contact and inhalation, even at levels thousands of times higher than lifetime consumer exposure, presents no significant risk.

In a 1977 editorial review in The Lancet, it was concluded that there was no reason to believe that normal human exposure to cosmetic talc has led to cancer at any site.

In 1987, the International Agency for Research on Cancer (IARC) reviewed all scientific information on talc, including reports of animal and in vitro studies, case reports, and all epidemiologic data. IARC did not find adequate evidence to conclude that talc without asbestos (which includes cosmetic grade) caused cancer in either animals or humans.

We intend to thoroughly review this study. However, we are confident that the information available continues to support the safety in use of cosmetic grade talc.

###

1101 17TH ST., N.W., SUITE 300 WASHINGTON, D.C. 20036-4702

202.331.1770 FAX 202.331.1969

SECURING THE INDUSTRY'S FUTURE SINCE 1894

Case ID: 190509334
Control No.: 24072736
PCPC_MD00031782

C T F A
THE COSMETIC, TOILETRY, AND FRAGRANCE ASSOCIATION

E. EDWARD KAVANAUGH

July 1, 1992

P R E S I D E N T

PRST 92-9

**CTFA Response Statement
(To be used to respond to inquiries.)****Safety of Talc (Ovarian)**

The paper published in the July issue of Obstetrics and Gynecology is an update of research previously published in 1984. This epidemiology study, which looks for possible associations between disease and exposures, concludes only that "talc use may increase the risk for epithelial ovarian cancer, but is unlikely to be the etiology [cause] for the majority of epithelial ovarian cancers."

Following the initial publication, industry sponsored a comprehensive study, undertaken at Battelle Pacific Northwest Labs, which demonstrated that talc does not translocate through the cervix to the uterine cavity or beyond.

A wide range of experts, including the International Agency for Research on Cancer (IARC), a part of the World Health Organization, reviewed the original report, as well as the vast body of scientific data from other epidemiology studies, case reports, and animal experiments and did not find the data adequate to suggest that cosmetic grade talc causes cancer.

Although we intend to thoroughly review the latest paper from the authors, we are confident that the information available continues to support the safety in use of cosmetic grade talc.

###

1101 17TH ST., N.W., SUITE 300 WASHINGTON, D.C. 20036-4702

202.331.1770 FAX 202.331.1969

SECURING THE INDUSTRY'S FUTURE SINCE 1894

Case ID: 190509334
Control No.: 24072736

PCPC_MDL00031783